

REMARKS

By this Amendment, the claims are amended to merely clarify the recited subject matter based on the recommendations provided by the Office Action and to correct an obvious typographical error in claim 1 as well as submitting a replacement abstract is submitted. Claims 1-3 and 5-13 are pending.

Claims 1-3, 5-6, 8-12 and 14 were rejected under 35 U.S.C. 102(e) as being anticipated by Liu (U.S. 6,396,828) and claims 7 and 13 were rejected under 35 U.S.C. 103(a) as being obvious from Liu. Applicants traverse the rejections because Liu fails to disclose, teach or suggest all the features recited in the rejected claims

For example, Liu, fails to disclose, teach or suggest the claimed method, arrangement or support node involved in providing Internet Protocol mobility service for a mobile station in a packet radio network, the claimed subject matter including integration of the foreign agent into a first support node included in the radio packet network, wherein the Internet Protocol address of, or provided by, the foreign agent is also the mobile station's care-of-address, as recited in independent claims 1, 9 and 12.

Liu merely discloses a packet radio service (GPRS) in its background art section; however, Liu fails to disclose, teach or suggest integrating a foreign agent into a first support node included in the packet radio network. The Office Action asserted that the claimed first support node was anticipated by Liu's mobility support node 60 with PPP server 21 and ASM, integrated with the foreign agent FA and that the claimed packet radio network was anticipated by Liu's elements 24-27 (see Fig. 5). However, that characterization is in error.

In Liu, the radio network (be it packet- or circuit-switched) ends at the InterWorking Function (IWF). The very purpose of the IWF is to interconnect a radio network to a wired network, such as a land-based telephone network or an IP network. Accordingly, Liu expressly teaches placing the foreign agent (FA 23) in a land-based network as opposed to a packet radio network (which only begins at the IWF).

Further, Liu's Mobile Switching Center(MSC) is clearly part of a circuit-switched network as opposed to a packet radio network, as recited in the rejected claims. Packet radio network and circuit-switched networks are established terms in the industry and no special meaning is assigned to them, either by Liu or by the Applicants. In a circuit-switched network, such as the GSM, a circuit (a point-to-point connection) is established for the entire duration of the connection, such as a call. In a packet radio network, no connection is established for the duration of a connection (or session, which term is usually used in connection with packet radio networks). Thus, the fact that Liu discloses using a PPP (point-

to-point protocol) server to transfer packets via a circuit-switched radio network (Liu's elements 29, 28, 27 and the radio interface to MS 20) does not render Liu's circuit-switched radio network a packet radio network.

Accordingly, Applicants traverse the rejections because: (1) Liu fails to disclose, teach or suggest a packet radio network but merely discloses a circuit-switched one (which is temporarily used as a medium for point-to-point protocol (PPP)); and (2) Liu fails to disclose the claimed foreign agent in a packet radio network because Liu merely discloses placing the foreign agent FA 23 in a land-based network. Thus, Liu, fails to disclose, teach or suggest the claimed method, arrangement or support node involved in providing Internet Protocol mobility service for a mobile station in a packet radio network, the claimed subject matter including integration of the foreign agent into a first support node included in the radio packet network, wherein the Internet Protocol address of, or provided by, the foreign agent is also the mobile station's care-of-address, as recited in independent claims 1, 9 and 12.

All rejections having been addressed, Applicants request issuance of a notice of allowance indicating the allowability of all pending claims. If anything further is necessary to place the application in condition for allowance, Applicants request that the Examiner contact Applicants' undersigned representative at the telephone number listed below.

Please charge any fees associated with the submission of this paper to Deposit Account Number 033975. The Commissioner for Patents is also authorized to credit any over payments to the above-referenced Deposit Account.

Respectfully submitted,

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